

Details of Representations Received to the Proposed Submission Local Plan (Reg19) February 2025

Denmead Allocations

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [Regulation 22 Statement of Consultation Part 2 \(November 2024\)](#) and SD16 [Regulation 20 representations \(November 2024\)](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

Local Plan Reference or document	Policy DEN1 Neighbourhood Plan Designation Area	
Total Number of Representations received	11	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	3
Sound	0	9
Complies with Duty to Cooperate	2	6
<p>Summary of Representations</p> <p>Whilst there is some support for Policy DEN1 there is concern the ‘100’ dwellings is not justified and not based on the consideration of reasonable alternatives, given its categorisation as a larger rural settlement in the settlement hierarchy. This is expressed in terms of the fact Denmead does not have the heritage constraints found in many other rural settlements and has ample room to consolidate its growth whilst avoiding the gap with Waterlooville.</p> <p>There is a request that the 100 should be increased to at least 200 if not more.</p> <p>Some representations refer to the need to prioritise brownfield land and to allocate smaller deliverable sites to provide a more flexible and resilient housing strategy, there is also criticism that there is an over reliance on windfall provision. Given the location of Denmead at the south of the District this could contribute to meeting the unmet need from neighbouring authorities such as Portsmouth and Havant.</p> <p>Southern Water specifically request to be consulted on the sites allocated within the updated Denmead Neighbourhood Plan for capacity assessments to be completed on their wastewater network.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BCM-X/3.0/DEN1</p> <p>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/38.0/DEN1</p> <p>ANON-AQTS-329G-X/1.0/DEN1</p> <p>ANON-AQTS-329E-V/7.0/DEN1</p> <p>ANON-AQTS-3BRU-N/2.0/DEN1</p> <p>ANON-AQTS-32NG-K/1.0/DEN1</p> <p>ANON-AQTS-327U-A - Southern Water/39.0/DEN1</p> <p>BHLF-AQTS-326Y-D/4.0/DEN1</p> <p>BHLF-AQTS-328D-T/5.0/DEN1</p> <p>BHLF-AQTS-3287-D/4.0/DEN1</p> <p>BHLF-AQTS-328R-8 - Hampshire County Council/36.0/DEN1</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Need to reconsider the quantum of development allocated to Denmead; given its categorisation as a larger rural settlement; 		

- Infrastructure capacity to accommodate new development; and
- Over reliance on brownfield and windfall sites as sources of housing supply.

Policy/Evidence base document	DEN1
Name of respondent (or client)	Bargate Homes Limited
Personal reference number	BHLF-AQTS-328D-T
Full reference number	BHLF-AQTS-328D-T/5/DEN1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Bargate object to Policy DEN1 on the basis that it seeks to allocate only 100 new homes through the Denmead Neighbourhood Plan and that these will not be granted planning permission before 2030 (criteria iii). The respondent highlights the requirements of Paragraphs 67 and 68 of the NPPF which do not change under the 2024 proposal. The current and emerging NPPF clearly requires housing needs for designated neighbourhood plan areas to be explicitly defined. While the Regulation 19 plan addresses this, it is based on housing requirements derived from a soon-to-be outdated standard methodology. If the plan is found sound at examination, the housing requirements for the WCC area will likely undergo significant changes. Consequently, paragraphs 67 and 68 of the NPPF will come into play, necessitating a re-assessment of the housing requirement for the Denmead neighbourhood plan area to ensure that if progressed the plan meets the basic conditions. This re-assessment will likely result in housing targets that exceed the current local plan allocation.</p> <p>This shift creates practical challenges for both WCC and Denmead neighbourhood plan group. Not least because the emerging local plan obligates the steering group to invest public funds and resources into preparing a neighbourhood plan, knowing that the housing requirement will need immediate review. The investment required to define a new housing target, outside the normal Local Plan cycle and ahead of WCC's own plan review, will strain resources. Even if a new housing requirement can be defined, it will then be necessary for the neighbourhood plan to assess the relevance of Policy H2's phasing restrictions—an issue better suited to a comprehensive Local Plan review.</p> <p>Even if paragraphs 67 and 68 of the NPPF were not engaged, and Denmead neighbourhood plan were allowed to proceed under the allocations of the Regulation 19 Local Plan, the phasing restrictions in Policy H2 would prevent any allocations from being implemented during the life of the plan. By the time these allocations could move forward, WCC should be nearing the end of its Local Plan review, at which point it would be necessary to assess whether the neighbourhood plan allocations align with updated housing requirements under the revised standard method and the broader strategic objectives of the Council. Thereby</p>

	<p>rendering the neighbourhood plan a wholly abortive exercise in respect of the allocation of land for housing, which would constitute a clear abuse of public resources.</p> <p>In this context, Bargate Homes argues that it would be an inefficient use of public funds to impose such strategic considerations on the Denmead neighbourhood plan. Therefore, WCC should directly allocate the housing requirements for the neighbourhood plan area in the Local Plan, rather than relying on neighbourhood plans to do so. This would not prevent neighbourhood plans from progressing on non-strategic issues relevant to its area.</p> <p>Alternatively, if Winchester allows Denmead neighbourhood plan to progress, the phasing restrictions in Policy H2 should be removed to ensure the plan is effective in the lifecycle of the Local Plan for the reasons set out above.</p> <p>Land availability in Denmead</p> <p>A total of 19 sites have been identified through the IIA as being suitable for development in Denmead. Collectively these sites would deliver 1,121 dwellings in a Larger Rural Settlement with a good range of services and facilities within walking and cycling distances. Yet only 100 dwellings are to be allocated through the neighbourhood plan. This figure is not considered justified or effective in meeting the housing requirements of the District, particularly given an expected 62% increase in housing need on adoption of the revised NPPF and the Government's objective of significantly boosting housing supply".</p> <p>As demonstrated by the sustainability appraisals in the IIA and the settlement hierarchy (Policy H3) Denmead is a sustainable location. The availability of land, as evidenced through the latest SHELAA submissions, is high. Bargate therefore object to the limit of 100 dwellings set by the policy and consider this should be increased to reflect the sustainability merits of Denmead, the expected increase in local housing need and to ensure local services and facilities are supported and maintained by an active local community. Importantly, Denmead also has the potential to assist WCC in accommodating the significant unmet needs in the region, particularly in Portsmouth and neighbouring Havant.</p> <p>Windfall Development</p> <p>The table on page 435 of the PSLP shows the sources of housing supply over the period 2020- 2040. This includes a windfall allowance of 50 dwellings for Denmead. For the reasons set out in Bargate's previous representations (Regulation 18) and in Section 3 of these representations, a direct local plan allocation should be made for Denmead. This would provide certainty and ensure that development is directed to a sustainable location and that it is supported by an appropriate level of infrastructure.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>WCC should directly allocate the housing requirements for the neighbourhood plan areas in the Local Plan, rather than relying on neighbourhood plans to do so. This would not prevent neighbourhood plans from progressing on non-strategic issues relevant to its area.</p> <p>Alternatively, if Winchester allows neighbourhood plans to progress with site allocations, the phasing restrictions in Policy H2 should be removed to ensure the plan is effective in the lifecycle of the Local Plan for the reasons set out above.</p>

	<p>The limit of 100 dwellings set by the policy should be increased to reflect the sustainability merits of Denmead, the expected increase in local housing need and to ensure local services and facilities are supported and maintained by an active local community. Importantly, Denmead also has the potential to assist WCC in accommodating the significant unmet needs in the region, particularly in Portsmouth and neighbouring Havant.</p> <p>The windfall allowance of for Denmead should be reduced and a direct local plan allocation should be made for Denmead. This would provide certainty and ensure that development is directed to a sustainable location and that it is supported by an appropriate level of infrastructure.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>WCC should directly allocate the housing requirements for the neighbourhood plan areas in the Local Plan, rather than relying on neighbourhood plans to do so. This would not prevent neighbourhood plans from progressing on non-strategic issues relevant to its area.</p> <p>Alternatively, if Winchester allows neighbourhood plans to progress with site allocations, the phasing restrictions in Policy H2 should be removed to ensure the plan is effective in the lifecycle of the Local Plan for the reasons set out above.</p> <p>The limit of 100 dwellings set by the policy should be increased to reflect the sustainability merits of Denmead, the expected increase in local housing need and to ensure local services and facilities are supported and maintained by an active local community. Importantly, Denmead also has the potential to assist WCC in accommodating the significant unmet needs in the region, particularly in Portsmouth and neighbouring Havant.</p> <p>The windfall allowance of for Denmead should be reduced and a direct local plan allocation should be made for Denmead. This would provide certainty and ensure that development is directed to a sustainable location and that it is supported by an appropriate level of infrastructure.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes Form (commenting on Policies and Evidence Base - includes pictures) Letter (commenting on Policies and Evidence Base - includes pictures)</p>

*such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	DEN1
Name of respondent (or client)	Bewley Homes
Personal reference number	ANON-AQTS-32NG-K
Full reference number	ANON-AQTS-32NG-K/1/DEN1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>The Local Plan does not adequately address the Duty to Cooperate, particularly in relation to unmet housing needs from neighbouring areas. A more collaborative and responsive approach is required to meet Winchester's legal obligations under national policy.</p> <p>Furthermore, the local plan can be considered unsound as it underestimates the scale of housing need, particularly in light of the significant unmet needs from neighbouring authorities such as Portsmouth and Havant. The current buffer of 1,450 homes is insufficient given the scale of these shortfalls.</p> <p>Additionally, with 1,544 households on the housing register and a house price-to-income ratio of 13.19, there is an acute need for affordable housing in Winchester. The Plan's 40% affordable housing target is inadequate and unlikely to be met without a stronger, more flexible housing strategy.</p> <p>Finally, the plan places too much emphasis on large strategic sites, which carry inherent risks of delays and infrastructure challenges. Smaller, more deliverable sites like Forest Road and Furzeley Road should be prioritised to diversify the housing supply and ensure a steadier rate of delivery.</p> <p>Please see more information with our attached representation (Iceni Projects - 241011 Denmead Reps Reg 19).</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>To make the Local Plan sound, we recommend the following actions:</p> <ul style="list-style-type: none"> • Increase the housing requirement: To more accurately reflect local and regional housing needs, particularly those of neighbouring authorities. • Allocate smaller, deliverable sites: Sites like Forest Road and Furzeley Road should be allocated to provide a more flexible and resilient housing strategy. • Strengthen the response to unmet need: Ensure Winchester contributes more meaningfully to the unmet housing needs in neighbouring authorities, improving cooperation and ensuring legal compliance. <p>Please see more information with our attached representation (Iceni Projects 241011 Denmead Reps Reg 19).</p>
What is your suggested wording or text for the policy?	<p>Please see more information with our attached representation (Iceni Projects 241011 Denmead Reps Reg 19). In conclusion, the land at Forest Road and Furzeley Road, Denmead, offers an excellent opportunity to deliver much-needed housing in a sustainable location, with minimal constraints and clear benefits to the local community. This site should be included within Winchester's Local Plan to help address</p>

both local housing needs and unmet needs from neighbouring authorities. However, the Local Plan as currently drafted has several deficiencies that must be addressed to make it sound.

Key points from this representation include:

- **Housing Need:** The Local Plan underestimates the scale of housing need, particularly in light of the significant unmet needs from neighbouring authorities such as Portsmouth and Havant. The current buffer of 1,450 homes is insufficient given the scale of these shortfalls.
- **Affordable Housing:** With 1,544 households on the housing register and a house price-to income ratio of 13.19, there is an acute need for affordable housing in Winchester. The Plan's 40% affordable housing target is inadequate and unlikely to be met without a stronger, more flexible housing strategy.
- **Reliance on Large Sites:** The Plan places too much emphasis on large strategic sites, which carry inherent risks of delays and infrastructure challenges. Smaller, more deliverable sites like Forest Road and Furzeley Road should be prioritised to diversify the housing supply and ensure a steadier rate of delivery.
- **Duty to Cooperate:** The Local Plan does not adequately address the Duty to Cooperate, particularly in relation to unmet housing needs from neighbouring areas. A more collaborative and responsive approach is required to meet Winchester's legal obligations under national policy.
- **Site Suitability:** The land at Forest Road and Furzeley Road is ideally suited for development, offering 100 units (including 40 affordable homes), new allotments, and enhanced biodiversity through a 10% biodiversity net gain. Its development would support the district's housing and environmental goals in a sustainable and well-connected location.

To make the Local Plan sound, we recommend the following actions:

- **Increase the housing requirement:** To more accurately reflect local and regional housing needs, particularly those of neighbouring authorities.

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- **Allocate smaller, deliverable sites:** Sites like Forest Road and Furzeley Road should be allocated to provide a more flexible and resilient housing strategy.
- **Strengthen the response to unmet need:** Ensure Winchester contributes more meaningfully to the unmet housing needs in neighbouring authorities, improving cooperation and ensuring legal compliance.

By adopting these changes, the Local Plan can provide a more effective, sustainable, and compliant approach to meeting housing demand across Winchester and its neighbouring areas. While the Plan is currently unsound, these modifications would ensure that it meets the necessary tests of soundness and better serves the housing needs of the district

Do you agree with how the policy will be monitored?

If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Supporting document 1 (Landscape Statement - Land at Forest Road/Furzeley Road, Denmead) Supporting document 2 (Site layout - Land at Forest Road/Furzeley Road, Denmead) Supporting document 3 (Preliminary Ecological Appraisal)

Policy/Evidence base document	DEN1
Name of respondent (or client)	Bewley Homes Ltd
Personal reference number	ANON-AQTS-3BRU-N
Full reference number	ANON-AQTS-3BRU-N/2/DEN1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Bewley Homes Ltd supports Policy DEN1 within the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 in principle; however, the company also objects on the basis of the new housing allocation figure of 100 dwellings (dealt with as part of representations to Policy H3) and the lack of mechanisms in place to enable the new housing allocation figure to be increased.</p> <p>Notwithstanding the representations made in respect of Policy H3 regarding the proposition that Denmead's new housing allocation figure should be increased to at least 200 dwellings, there should also be some allowances built into Policy DEN1 so that Denmead's new housing allocation could be increased beyond the current 100 dwellings.</p> <p>The table under paragraph 14.83 should be updated to include updated figures for 2024. It is not clear why the two remaining undeveloped housing allocations in the 'made' Denmead Neighbourhood Plan (Policy 2: Housing Site Allocations ii and iv) are given a figure of 28 dwellings in the same table. These two allocations propose about 20 dwellings and 10 dwellings respectively.</p> <p>If either or both of the two remaining and undeveloped housing allocations in the 'made' Denmead Neighbourhood Plan (Policy 2: Housing Site Allocations ii and iv) are not built out, or if they do not achieve the expected numbers, then any shortfall should be added to Denmead's housing allocation figure, whether it remains at 100 dwellings or if it were to be increased to 200 or more dwellings.</p> <p>A further revision to Policy DEN1 should address any shortfall of the 50-dwelling windfall allowance figure and add this to the allocation requirement on an ongoing basis</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Update the housing figures in the Denmead Housing Sources table to reflect changes to net completions, outstanding permissions and remaining Neighbourhood Plan allocations as of 2024.</p> <p>Change the housing figure for Denmead in the New Sites to be allocated in DNP Review to at least 200 dwellings.</p> <p>Amend wording of Policy DEN1 to refer to about 200 dwellings instead of 100 dwellings.</p>
What is your suggested wording or text for the policy?	<p>Amend Policy DEN1 to state: Land will be allocated for development in the Denmead Neighbourhood Plan for about 200</p>

	<p> dwellings, including any required amendments to the settlement boundary. Development will be expected to address the following:</p> <ul style="list-style-type: none"> i. Show how they are contributing towards the Vision and Objectives of the Plan in Policy SP1 and in general conformity with its strategic approach; ii. Have regard to information on local need for new homes, jobs and facilities, for their plan area; iii. Be phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	DEN1
Name of respondent (or client)	C Cahill
Personal reference number	ANON-AQTS-3BCM-X
Full reference number	ANON-AQTS-3BCM-X/3/DEN1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	Denmead parish council has a duty to propose the best available sites to the community for consultation.
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Policy DEN 1</p> <p>Denmead must allocate the best available sites with supporting evidence from the independent assessment and DPC weighted score site scores.</p> <p>Inclusion of 10% of allocated sites as small sites to achieve the community's aspiration for small sites</p> <p>There should be at least 1 small site dedicated to self / custom build to meet local demand</p> <p>Brownfield sites must be used first</p>
What is your suggested wording or text for the policy?	<p>Denmead must provide evidence that the sites allocated are the best available</p> <p>10% of the allocated sites must be provided on small sites, in line with the NPPF</p> <p>Denmead must allocate a separate site to accommodate self custom build homes</p> <p>All sites included must be supported through communication consultation</p>
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	DEN1
Name of respondent (or client)	Morag Kirby
Personal reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
Full reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/38/DEN1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	Whilst there has been good collaboration between the ICB and WCC during the Local Plan process, our request is an amendment to the policy as outlined in the full response which has been submitted via email on 08/10/2024. - Whilst there is supporting text for healthcare infrastructure there is no inclusion within the policy that directly supports the need for sufficient healthcare infrastructure. The policy needs an inclusion to contribute to infrastructure
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	DEN1
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/36/DEN1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	100 dwellings could generate up to 30 additional primary age pupils and 21 secondary age pupils. The site is served by Denmead Infant and Junior Schools and The Cowplain School. It is likely that these additional children could be accommodated within the existing primary and secondary provision.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies and evidence base)

Policy/Evidence base document	DEN1
Name of respondent (or client)	OWEN JONES
Personal reference number	BHLF-AQTS-326Y-D
Full reference number	BHLF-AQTS-326Y-D/4/DEN1
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>4 Denmead</p> <p>4.1. The spatial strategy focuses development at Winchester in the first instance and then large scale allocations in what is termed the PUSH area (west of Waterlooville and north of Whiteley). There then follows a series of market towns and larger rural villages; of which Denmead is one.</p> <p>4.2. The Background Paper relating to Settlement Strategy, reviewed in 2022, provides the justification for this categorisation and Denmead is plainly amongst the better performing settlements in terms of the range of facilities and accessibility.</p> <p>4.3. Denmead also benefits from its proximity to Waterlooville. Conveniently accessible to the residents of Denmead are the higher order services that have justified the strategic role afforded to this main town. The proximity of these two settlements is best highlighted by the fact there is a strategic gap designation between them to prevent coalescence. Whilst that may be appropriate in terms of the morphology of the settlements, it emphasises the spatial and function inter-relationships between them.</p> <p>4.4. Denmead is materially different to other settlements in this regard, for example Swanmore and Wicklow and Colden Common, that are more remote from the District's main settlements.</p> <p>4.5. Policy DEN1 of the consultation document intends that Denmead accommodate some 330 new homes over the period 2020-2041. This is not an effective policy in the context of other representations made concerning housing provision or on its own face regardless.</p> <p>4.6. Of this total, 117 have already been built. In the event the plan period is changed for the reasons given in preceding sections, Denmead is intended to provide 211 new homes. Its contribution to the total housing requirement would fall from 2.1% to 1.6%. To maintain the same proportion in the alternative scenario, Denmead's contribution would need to increase to 290 new homes (excluding completions).</p> <p>4.7. The components of supply include outstanding commitments and allocations from the Neighbourhood Plan and a windfall allowance of 50 dwellings. This windfall allowance is a highly uncertain component. The NPPF is clear that:</p> <p>"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to</p>

	<p>the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.” (paragraph 72 refers)</p> <p>4.8. The illustration of the settlement boundary (as existing) is shown on page 436 of the consultation document. Examination of this reveals very few opportunities for windfall development within the settlement boundary and it is notable that there are no proposed revisions to the boundary. Where there are greenspaces, these are either established areas of open space or large residential curtilages.</p> <p>4.9. The genuine opportunity for windfall development is extremely limited and is not justified. No reliance should be placed on this in meeting Denmead’s housing requirement.</p> <p>4.10. For all of these reasons, Policy DEN1 should propose new housing allocations of at least 230 for the period 2024-2041, comprised of the following:</p> <table data-bbox="566 470 1545 614"> <tr> <td>Outstanding permissions</td> <td>33 dwellings</td> </tr> <tr> <td>Remaining Neighbourhood allocations</td> <td>28 dwellings</td> </tr> <tr> <td>New sites to be allocation in DNP Review</td> <td>229 dwellings</td> </tr> <tr> <td>Total</td> <td>290 dwellings</td> </tr> </table> <p>2.17% of 13,392 dwellings derived from the current standard method</p> <p>4.11. Policy DEN1 should be amended accordingly in order for it to be justified and effective and positively prepared.</p> <p>4.12. We are aware that the Neighbourhood Plan group are currently consulting on options that could provide allocations totalling 300 new homes. One of those options is land controlled by Hallam (see Appendix 1).</p>	Outstanding permissions	33 dwellings	Remaining Neighbourhood allocations	28 dwellings	New sites to be allocation in DNP Review	229 dwellings	Total	290 dwellings
Outstanding permissions	33 dwellings								
Remaining Neighbourhood allocations	28 dwellings								
New sites to be allocation in DNP Review	229 dwellings								
Total	290 dwellings								
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>									
<p>What is your suggested wording or text for the policy?</p>									
<p>Do you agree with how the policy will be monitored?</p>									
<p>If no, please explain</p>									
<p>Do you want to participate in hearing sessions for this policy?</p>									
<p>Have you submitted supporting information?</p>	<p>Yes Form (Commenting on policies) Supporting Information (Site promotion - Land at Hambledon Road, Denmead)</p>								

All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	DEN1
Name of respondent (or client)	Peter Nicholas Homes
Personal reference number	ANON-AQTS-329G-X
Full reference number	ANON-AQTS-329G-X/1/DEN1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent queries whether 3,850 or 3,825 homes should be used in relation to the Market Towns and Rural Areas. Policy SP H3 identifies that 1,570 new homes will be provided by the Larger Rural Settlements that fall within the MTRA. One of the Larger Rural Settlements is Denmead, a large village, close to Waterlooville with its extensive range of facilities and services. In the Settlement Hierarchy Background Paper it ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides. Denmead seems to be a logical sustainable place to accommodate significant future growth and this is recognised in the Settlement Hierarchy Background Paper which states “Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because residents would be able to access a greater range of services and facilities more easily, without the need to travel by private car which is the least sustainable form of transport and which adds most carbon emissions, the reduction of which is a key council objective in achieving carbon neutrality by 2030.”</p> <p>The respondent states that given the sustainable nature of Denmead it would be expected that it would accommodate meaningful growth levels in the emerging plan, especially in the period 2024 to 2040. Disappointingly, the Council has limited its ambitions in relation to the Denmead which is only accommodating 330 new dwellings or 8% of the MTRA housing provision. Furthermore, Paragraphs 14.83 and 14.84 indicate that the Council is largely relying on completions, commitments and an existing allocation, to accommodate future growth in Denmead up until 2040, rather than delivering new sites. In terms of allocating new future sites in Denmead, the Council has given the Parish a housing target of 100 new homes to accommodate through the Neighbourhood Plan process. Although Denmead is considered a sustainable location for accommodating growth it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan period. The housing is expected to be delivered through the Neighbourhood Plan process and phased to the latter part of the Plan period – i.e. after 2030. It is not clear why Denmead’s potential future growth has been so constrained, especially when there are sustainable sites on the edge of the village that could be brought</p>

forward in the plan period without compromising openness and closing the gap between Denmead and Waterlooville

The current approach reads as a lack of commitment to deliver future sustainable growth. The settlement is capable of accommodating additional new housing development post 2024 in a sensitive and sustainable way. The Council should reassess the ability of Denmead to accommodate higher levels of housing growth, particularly in light of the need to accommodate acute future housing need. Overall, the spatial approach in relation to Denmead is overly cautious and is not considered to be justified or positively prepared

The respondent considers that the Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Denmead. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium and strategic sized sites available in Denmead that could be brought in a sensitive manner to help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm. Both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 of the emerging local plan. Waterlooville, enhances the quality and accessibility of the space between the settlements and assists at a strategic level with providing for additional housing. Most of the site is included in the SHELAA as DEN 22 and DEN 23. A large part of it is identified as being deliverable/developable. It is submitted that Furzeley Village should come forward as a strategic allocation in the emerging plan in the form of a settlement extension, rather than being left to the much slower, piecemeal and less certain Neighbourhood Planning process. The non inclusion of the site as a strategic allocation in the emerging plan and the reliance on a Neighbourhood Plan process that has been limited in scope to 100 units is considered both a flaw and unjustified. In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

- The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process.
- Furzeley Village site be included as a strategic mixed use allocation for Denmead
- Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030
- The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 & 23 lying to the south and south west of Denmead Furzehill Farm Furzehill Farm lies to the south of Denmead on Sheepwash Lane. It is a medium sized site south of Newlands Lane and Furzeley village site. A map showing the location and extent of the site is contained in Appendix 3.

In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

	<ul style="list-style-type: none"> • The housing requirement for Denmead be significantly increased to enable strategic allocations as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process • Policy SP H2 and DEN1 be amended to allow sites and Furzehill Farm to come forward before 2030
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document 1 (Commenting on policies and policies map) Supporting document 2 (Vision document - Furzeley Village, Denmead)

Policy/Evidence base document	DEN1
Name of respondent (or client)	Ryan Patrick Lownds
Personal reference number	ANON-AQTS-327U-A - Southern Water
Full reference number	ANON-AQTS-327U-A - Southern Water/39/DEN1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Policy DEN1 Neighbourhood Plan Designated Area - Denmead Neighbourhood Plan</p> <p>As agreed in our duty to co-operate meeting held 30 September 2024, we have not undertaken a capacity assessment of our wastewater network in relation to the 100 dwellings proposed for the Denmead Neighbourhood Plan. Therefore, it will be vitally important that Southern Water are consulted on the Neighbourhood Plan once the allocated sites are established, as to allow us to undertake the assessment. This could be recognised with the following policy criterion.</p> <p>Southern Water must be consulted on the sites allocated within the updated Denmead Neighbourhood Plan for capacity assessments to be completed on their wastewater network and for policy to be applied as required.</p> <p>Supporting Text:</p> <p>This criterion for Policy DEN1 is required because proposals for the number of dwellings at allocated sites could generate a need for reinforcement of the network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at sites ahead of new infrastructure delivery could lead to an increased risk of flooding or result in low water pressure unless the requisite works are implemented in advance of occupation.</p> <p>Southern Water has limited powers to prevent connections to the network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023).</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We propose the following policy criterion.</p> <p>Southern Water must be consulted on the sites allocated within the updated Denmead Neighbourhood Plan for capacity assessments to be completed on their wastewater network and for policy to be applied as required.</p>

What is your suggested wording or text for the policy?	Southern Water must be consulted on the sites allocated within the updated Denmead Neighbourhood Plan for capacity assessments to be completed on their wastewater network and for policy to be applied as required.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting Document (Commenting on policies)

Policy/Evidence base document	DEN1
Name of respondent (or client)	Thomas Hutchinson
Personal reference number	ANON-AQTS-329E-V
Full reference number	ANON-AQTS-329E-V/7/DEN1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The '100 dwellings' proposed for Denmead is not justified and is not based on consideration of reasonable alternatives that would bring greater benefits to the settlement. The settlement has the sixth highest score in the whole District and the third ranked of the rural service centres as set out in the Settlement Hierarchy Background Paper to Inform the Local Plan (August 2024 Update). The amount of growth proposed is based on spreading about 100 homes to each of the rural services centres rather than looking closely at their social and economic needs and their particular environmental constraints. Denmead does not have the heritage constraints found in many other rural settlements and has ample room to consolidate its growth whilst avoiding the gap to Waterlooville, as evidenced by the SHELAA evidence. Its proximity to the South Downs National Park means that it is able to provide a service centre for settlements within the park that lack local services without the landscape harm that would result from housing growth within this protected landscape. At the same time, its location close to the urban area means that its CO2 emissions per capita are lower than areas to the north and south of the National Park which display relatively high levels of CO2 emissions per capita from commuting such as New Alresford, as noted in paragraph 4.35 on page 121 of the final Integrated Impact Assessment Report (July 2024).</p> <p>There is no mention of Denmead in the Winchester Design Workshops Report of Workshop 3: Market Towns and Rural Villages (January 2022) which was intended to consider how positive change through development to improve outcomes for existing as well as new residents. This could have provided a basis for exploring how new housing can deliver a range of benefits for the existing community.</p> <p>Moreover, the reliance on windfall development is not justified and risks being ineffective as a policy, given the assumption on which it based- extrapolation of historical trends for recycling employment and commercial uses.</p> <p>The current Local Plan was prepare on the basis of previous iterations of the NPPF, but by the time of the examination there is almost certainly going to be a new NPPF in place that prioritises housing delivery. So we would expect the examination to have a hearing session on whether the submitted Plan accords with the latest national policy. In the circumstances we suggest a doubling of the allocation number, but will revisit when the final wording is available.</p>

<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>The allocation should be increased from 100 to 200 dwellings.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>Land will be allocated for development in the Denmead Neighbourhood Plan for about 200 dwellings</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	DEN1
Name of respondent (or client)	VIVID Housing
Personal reference number	BHLF-AQTS-3287-D
Full reference number	BHLF-AQTS-3287-D/4/DEN1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>VIVID has an interest in the land south of Forest Road, Denmead (Site DE22). We note that the intention within the Regulation 19 version of the emerging Local Plan (the Local Plan) is still to identify a quantum of development to occur at Denmead, but defer the site selection process to the emerging replacement for the 2015 Neighbourhood Plan.</p> <p>At Regulation 18 stage in December 2022 (when it was unclear how quickly the replacement Neighbourhood Plan (rNP) would proceed), we commented that “there may be scope for more than the additional 100 homes” and the “estimate of 50 windfall homes is considered to be optimistic”(via representation 1023218185). This remains relevant in the context of the proposed revisions to the National Planning Policy Framework (NPPF), including the new standard method for calculating housing need, but also in the context of the challenge for this Local Plan to address affordability and unmet needs in the region. Denmead is classified as a Large Rural Settlement in the Settlement Hierarchy (Strategic Policy H3) reflecting its level of daily facilities and other facilities (Settlement Review Background Paper August 2024), including Primary School, local convenience retail, local employment and sport facilities (‘Key services’), as well as, amongst others, post office and doctors surgery (‘Other facilities’). The evidence confirms that this large village has a good degree of sustainability, therefore, is a logical location for sustainable growth. It is also close to the neighbouring authorities with unmet needs, including Portsmouth and Havant.</p> <p>Policy DEN1 sets a housing requirement of 100 homes for the new Neighbourhood Plan. Capacity for housing development is significantly higher than this requirement. Fifteen sites are identified in the SHELAA with an estimated capacity of 1,703 dwellings (DSSS, paragraph 6.22). Therefore, around only 5% of the available capacity will be required to be allocated through the new Neighbourhood Plan, or in other words, 95% of the available capacity will be omitted. For affordable housing, the consequence is a significant constraint on the number of affordable homes that might otherwise be achieved from the available land.</p>

In the context of significant unmet need from neighbouring authorities in South Hampshire, this is also a significantly constrained policy approach from the Local Plan. Consultation on the Neighbourhood Plan in September 2024 (the Options 24 consultation) has three alternative options. These range from 91 homes to 100 homes; none of the options consider going above that requirement. The Local Plan is the factor constraining supply of new homes and affordable homes.

This level of constrained supply needs to be appreciated in the context of the national policy objective to significantly boost housing supply (NPPF 60) and in the context of affordability being one of the most significant issues in the district – and the delivery of affordable homes “a major issue” and “a critical priority”(Local Plan paragraph 9.36) – plus significant levels of unmet need from neighbouring authorities. VIVID therefore considers that the requirement for Denmead is not justified by the evidence base, is inadequate in the context of need, and does not represent positive planning.

Notwithstanding the growing scale of local housing need, VIVID is concerned that documents supporting the rNP that purport to fulfil the obligations of The Environmental Assessment of Plans and Programmes Regulations 2004 fail to assess all the sites that have been put forward for consideration. In particular, the Denmead Site Assessment and Options Appendix A Pro Formas June 2024 document, which underpins the Denmead Site Assessment and Options Final Report July_2024 omits any assessment of 14 promoted sites that lie to the south-east of the Denmead settlement boundary (between Denmead and Waterlooville). We note that the Integrated Impact Assessment (IIA) includes assessment of most of the available sites in the settlement gap, including Site DE22, whereas the equivalent document supporting the rNP does not. It is clear that WCC recognise that, in accordance with the NPPF, the settlement gap policies are not the blanket “screening out” factor that the Steering Group (through its consultants AECOM) have, erroneously, concluded it to be.

This omission has resulted in Pro Vision writing to the Steering Group for the rNP (in Sept 2024) expressing concern that the NP process has a potential procedural problem and recommending that its consultant (AECOM) completes full assessments of all sites, including DE22. VIVID conclude that at the very least the rNP should assess sites between Denmead and Waterlooville to assess their sustainability credentials as well as their impact on the function of the settlement gap (in accordance with policy NE7).

A vision and concept master plan has been submitted to the Steering Group showing how development of DE22 could deliver around 100 homes³ including affordable homes, (which, at the policy requirement for greenfield sites, equates to potential for around 40 affordable homes) and including wider public benefits relating to integration of existing public open space with the village, whilst preserving the function of the settlement gap, providing a strong, defensible boundary. We acknowledge that site selection is a matter

	<p>deferred to the neighbourhood plan process and therefore do not repeat that site specific information here (although it has already been shared with the City Council at Regulation 18 stage).</p> <p>The interaction between the Local Plan and the neighbourhood plan process in Denmead (and elsewhere in the district) needs to be effective, given the responsibility that is deferred to these local communities. It is also appropriate that the Local Plan includes appropriate contingency plans should the neighbourhood plan process fail, for whatever reason, to deliver the strategic objectives. Policy DEN1 (in common with the other Neighbourhood Plan Area policies) is missing a contingency plan. Other local authorities, such as South Oxfordshire District Council and the West Berkshire Local Plan Review include such contingencies recognising the potential for complications, including the requirement for a referendum before plans are 'made' and become part of the development plan.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Proposed modification: Increase in the housing requirement for Denmead in the context of affordability issues and unmet needs from neighbouring authorities, and the scale of available land, and inclusion of contingency plans in the event that the neighbourhood plan process is unable to identify land for development within a reasonable timescale.</p>
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies and evidence base)</p>

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modifications](#) to criterion ii in response to representations from ICB (criterion ii of Policy DEN1) and new paragraph to supporting text to reflect comments by Southern Water (new paragraph 14.86a).